



Dan G. Boyle  
[dboyle@bsfllp.com](mailto:dboyle@bsfllp.com)  
Tel: (213) 995-5732

June 19, 2025

**VIA ECF**

Honorable Jesse M. Furman, U.S.D.J.  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: ***In Re: Application of Yulia Guryeva-Motlokhov, No. 25-mc-98 (JMF)***  
***Letter Update Regarding Proposed Protective Order (ECF No. 49)***

Your Honor,

We represent Applicant Yulia Guryeva-Motlokhov (“Applicant”) and write to confirm to the Court that Applicant conferred with counsel for movants prior to submitting the proposed protective order filed on June 17, 2025.

Counsel for both Applicant and movants approved the language of the filed proposed protective order on behalf of all parties involved. Applicant’s counsel also confirmed with movants’ counsel prior to filing the proposed order that there were no objections.

Applicant respectfully requests that the court endorse the proposed protective order and apologizes for any confusion regarding the parties’ position. To the extent that the Court requires additional information regarding the proposed protective order, Applicant can submit any supplemental information by letter within 24 hours of the Court’s direction.

Respectfully submitted,

**BOIES SCHILLER FLEXNER LLP**

/s/

E. Martin De Luca  
[mdeluca@bsfllp.com](mailto:mdeluca@bsfllp.com)  
Boies Schiller Flexner LLP  
55 Hudson Yards  
New York, NY 10001  
Tel: (212) 446-2300

Dan Boyle  
[dboyle@bsfllp.com](mailto:dboyle@bsfllp.com)  
Boies Schiller Flexner LLP  
2029 Century Park Est, Suite 1520

BOIES SCHILLER FLEXNER LLP



Los Angeles, CA 90067  
Tel: (213) 995-5732

Daria Pustilnik  
[dpustilnik@bsflp.com](mailto:dpustilnik@bsflp.com)  
Boies Schiller Flexner LLP  
100 SE Second Street, Suite 2800  
Miami, FL 33131  
Tel: (305) 357-8423

*Attorneys for Applicant*

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